

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jerome McNeil

Case No.

Case: 2:23-mj-30130

Assigned To : Unassigned

Assign. Date : 3/31/2023

SEALED MATTER (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 19, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 31, 2023

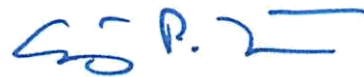
City and state: Detroit, Michigan



Complainant's signature

Jameria Caldwell, Special Agent (ATF)

Printed name and title



Judge's signature

Hon. Antony P. Patti, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT

I, Jameria Caldwell, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been for approximately seven years. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with the ATF, I have conducted and/or participated in numerous criminal investigations focused on firearms, narcotics, armed drug trafficking violations, and criminal street gangs.

2. I make this affidavit from personal knowledge based on my participation in this investigation, with exception of the matters expressly stated, which are based on information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all details or facts that exist pertaining to the investigation.

3. ATF is currently conducting a criminal investigation concerning Jerome MCNEIL (XX/XX/1986), for violating 18 U.S.C. § 922(g)(1) (possession of a firearm by a felon).

II. INVESTIGATION AND PROBABLE CAUSE

4. According to law enforcement reports, on March 19, 2023, at approximately 21:03 hours, Detroit Police Department (DPD) officers working patrol in Detroit's Eighth Precinct observed a Black Jeep Cherokee bearing Michigan license plate ERF0035, traveling southbound on Winthrop approaching Eaton. Officers conducted a law enforcement database query of the license plate and determined the vehicle was not equipped with insurance.

5. At that time, officers initiated a traffic stop on the vehicle. The driver, who was later identified as Jerome MCNEIL, did not stop right away, and continued traveling southbound for several houses. While behind MCNEIL, both officers observed MCNEIL reaching his body toward the right side of the vehicle, so much so that his torso neared the passenger seat and the vehicle was veering to the side.

6. Once the vehicle finally came to a stop, officers exited their scout car and approached the vehicle, which was occupied solely by MCNEIL. One of the officers notified MCNEIL for the reason of the traffic stop and asked for a valid driver's license. MCNEIL was also asked if he was a concealed pistol license (CPL) holder and if there were any weapons or contraband in the vehicle.

7. MCNEIL said that he was not a CPL holder and that there were no weapons in the vehicle and consented to a vehicle search. MCNEIL then provided

officers with an identification card, but not a driver's license. Due to MCNEIL possessing neither a valid driver's license nor insurance, MCNEIL was detained.

8. Officers began searching the vehicle pursuant to consent and for inventory purposes given that MCNEIL could not drive it.

9. While one officer began searching the vehicle, the other officer noted that MCNEIL became very nervous and began to breathe heavily. Once the other officer approached the passenger side of MCNEIL's vehicle, MCNEIL began to state "I'm cooked" multiple times.

10. The officer searching the vehicle noticed the window controls on the driver side door were loose and easily accessible. The officer removed the window control and recovered one (1) clear knotted plastic bag containing suspected fentanyl and one (1) clear knotted plastic bag containing suspected cocaine from the hidden compartment of the driver side door. The officer then searched the passenger door and observed the window controls were also loose and easily accessible. The officer removed the window control and recovered a loaded Glock 30s, .45 caliber pistol with serial number BCY319, and an extended magazine from the hidden compartment of the front passenger side door. MCNEIL was arrested for carrying a concealed weapon and ultimately transported to the Detroit Detention Center (DDC) for processing and lodging.

11. On March 23, 2023, I reviewed a computerized criminal history (CCH) for MCNEIL which revealed the following the following felony convictions:

- 2011 – Home Invasion 2nd Degree – 3rd Circuit Court.
- 2012 – Felon in possession of a firearm, carrying a concealed weapon, and felony firearm – 3rd Circuit Court.
- 2012 – Two counts of larceny over \$1,000 but less than \$20,000 – 3rd Circuit Court.
- 2018 – Delivery/manufacture of a narcotic – 3rd Circuit Court.

12. MCNEIL appears to have served a sentence of more than one year in prison in Michigan Department of Corrections for at least one of the convictions appearing in the preceding paragraph. Additionally, on February 4, 2016, MCNEIL executed a standard form CSJ-290 “Prisoner Pre-Release Notice” with the Michigan Department of Corrections, therein acknowledging his awareness that he was ineligible to possess a firearm under federal law. Accordingly, there is probable cause to believe that MCNEIL knew he had been convicted of a crime punishable by imprisonment or more than one year.

13. Lastly, on March 28, 2023, I contacted Special Agent (SA) Jacobs, an expert in the interstate nexus of firearms and ammunition. SA Jacobs concluded

that the firearm, based on the written description provided, without physically examining it, is a firearm as defined by federal law and was manufactured outside the state of Michigan and therefore traveled in and affected interstate commerce.

III. CONCLUSION

14. Based on the aforementioned facts, probable cause exists that Jerome MCNEIL (XX-XX-1986), a previously convicted felon, did knowingly and intentionally possess a firearm, which traveled in and affected interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1). Said violations occurring on or about March 19, 2023, in the city of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Special Agent Jameria Caldwell
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. ANTHONY P. PATTI
United States Magistrate Judge

March 31, 2023